

**REMARKS**

The Substitute Specification incorporating the foregoing preliminary amendment is being filed concurrently herewith

If there are any additional fees associated with filing of this Preliminary Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

STAAS & HALSEY LLP

Date: Sept 1 2006

By: Mark J. Henry  
Mark J. Henry  
Registration No. 36,162

1201 New York Ave, N.W., 7th Floor  
Washington, D.C. 20005  
Telephone: (202) 434-1500  
Facsimile: (202) 434-1501